EPA

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e. PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 I D G 1 3 0 1 1 9 11	12 2 0 0 2 1 2 17	18 C	19 S	20 3

Remarks

21 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 4 5 69	70 3	71 N	72 N	73 74	75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
White Water Fisheries, Inc. - Bedrock Ranch 393 River Rd. Bliss, ID 83314	12:30 PM 2/12/2020	12/1/2007
	Exit Time/Date	Permit Expiration Date
	4:00 PM 2/12/2020	11/30/2012

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Numbers
Stanley Standal - President, White Water Fisheries, Inc.
Phone: 1-208-837-4970
standal@rtci.net

Other Facility Data (e.g., SIC, NAICS, and other descriptive information)
SIC:0273 (Animal Aquaculture)
NAICS: 112511 (Finfish Farming and Fish Hatcheries)

Name, Address of Responsible Official/Title/Phone and Fax Number
Stanley Standal - President, White Water Fisheries, Inc.
609 River Rd.
Bliss, ID 83314
Phone: 208-837-4970

Contacted: [x] Yes [ ] No

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

x	Permit	x	Self-Monitoring Program		Pretreatment		MS4
x	**Records/Reports**		Compliance Schedule		Pollution Prevention		
x	Facility Site Review		Laboratory		Storm Water		
x	Effluent/Receiving Waters	x	Operations & Maintenance		Combined Sewer Overflow		
x	Flow Measurement	x	Sludge Handling/Disposal		Sanitary Sewer Overflow		

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Nicholas Waters, IPDES CO	DEQ / TFRO / 208-736-2190 / 208-736-2194	3/12/2020
Tobby Kennedy, IPDES CO	DEQ / TFRO / 208-736-2190 / 208-736-2194	3/12/2020
Nicole Deinarowicz, IPDES CEO	DEQ/ State Office / 208-373-0591	3/18/2020

STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

650 Addison Avenue West, Suite 110 • Twin Falls, Idaho 83301 • (208) 736-2190
www.deq.idaho.gov

Governor Brad Little
Director John H. Tippets

March 20, 2020

Stanley Standal
White Water Fisheries, Inc.
609 River Rd.
Bliss, ID 83314

Subject: Aquaculture Compliance Evaluation Inspection at Bedrock Ranch, NPDES Permit Number IDG130119

Dear Mr. Standal:

On February 12, 2020, the Idaho Department of Environmental Quality (DEQ) conducted a Compliance Evaluation Inspection of White Water Fisheries, Inc. – Bedrock Ranch aquaculture facility on behalf of EPA Region 10. The purpose of this inspection was to determine compliance with provisions of the Clean Water Act and the facility's NPDES Permit IDG130119.

DEQ greatly appreciates your cooperation and the assistance you and Mrs. Standal provided during the inspection process. A copy of the inspection report has been included for reference and your records.

During the course of the inspection no areas of concern were identified.

Please continue to ensure all aspects of your operation are conducted in accordance with applicable federal, state, and local requirements.
The inspection report in its entirety has been submitted to the EPA, which retains all rights to pursue enforcement actions to address additional concerns and any other violations.

If you have any questions about the inspection, please contact me at (208)-736-2190 or via e-mail at nicholas.waters@deq.idaho.gov. Alternatively, you may contact Maria Lopez at (208) 378-5616 or via e-mail at lopez.maria@epa.gov.

Sincerely,

Nicholas Waters
IPDES Regional Compliance Officer

NW:sh

Enclosure (1)

c: Brynn Lacabanne, DEQ State Office
Michael Brown, DEQ Twin Falls Regional Office
Maria Lopez, EPA-Region 10

NPDES Aquaculture Compliance Evaluation Inspection Report

Bedrock Ranch

Permit Number: IDG130119
Inspection Date: February 12, 2020

Prepared by
Nicholas Waters – IPDES Compliance Officer

Twin Falls Regional Office
650 Addison Ave W Suite 110
Twin Falls, ID 83301

Report Date: March 20, 2020

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1 Facility Information

Facility Name:	Bedrock Ranch (John Fleming Ponds)
Permit Number:	IDG130119
Permit Status:	Aquaculture General Permit IDG130000 Effective date: December 1, 2007 Expiration date: November 30, 2012 *Permit has been administratively continued*
Facility Type:	Concentrated Aquatic Animal Production Facility
Facility Classification:	Minor
SIC Code:	0273 (Animal Aquaculture)
NAICS Code:	112511 (Finfish Farming and Hatcheries)
Facility Location:	393 River Rd. Bliss, ID 83314
Mailing Address:	609 River Rd. Bliss, ID 83314
Facility Contact:	Stan Standal – President, White Water Fisheries, Inc. Office: (208)-837-4970 *standal@rtci.net*

1.1 Owner and Operator Information

Bedrock Ranch is owned by Stan and Loretta Standal and operated by White Water Fisheries, Inc. The primary contact for White Water Fisheries, Inc. – Bedrock Ranch is Stan Standal, President.

1.2 Background

Bedrock Ranch is a minor cold water concentrated aquatic animal production facility that produces between 100,000 and 500,000 pounds of harvestable weight on an annual basis. The facility has a commercial fish rearing license (#202) for rainbow trout (*Oncorhynchus mykiss*).

Annual fish production at this facility for 2019 was 85,398 pounds, but has historically averaged around 160,000 pounds. The facility's NOI indicates potential for up to 300,000 pounds of annual production. In accordance with this production potential, Mr. Standal is required by the Permit to monitor quarterly for total suspended solids (TSS) and total phosphorous (TP). This facility does not process fish on site.

Bedrock Ranch is located approximately 3.5 miles southeast of Bliss, Idaho and discharges to an 'unnamed creek,' which discharges to the Snake River. The facility's discharge can be routed through a pipe to a hydropower facility that also discharges to the Snake River.

The facility is supplied with spring water from two sources – Montana Mining Ditch Springs and an 'unnamed' creek. Mr. Standal has multiple water rights for fish production on these sources with Idaho Department of Water Resources, including: 37-21222 (4 cfs) and 37-21221 (4 cfs).

The facility consists of: an upper bank of four concrete raceways (1-4) arranged in series, and two earthen production ponds (5 & 6) in series. The concrete raceways are equipped with quiescent zones (QZs) and QZ solids from these raceways are pumped to a non-discharging, evaporative pond. The earthen production ponds are each equipped with a full-flow settling basin (FFSB). Currently, both of the facility's earthen production ponds are not in production.

The facility's total flow measurement is taken from the upper raceways –and consists of three, 43" contracted rectangular weirs. Mr. Standal uses a ruler and the University of Idaho's Water Measurement bulletin to calculate flows.

Influent water quality (WQ) parameters of TSS and TP are measured through the collection of composite samples taken at the upper raceway head ditch and consist of a minimum of four grab samples taken at 30 minute intervals or greater.

Effluent WQ parameters of TSS and TP are measured through the collection of composite samples and consist of a minimum of four grab samples taken at 30 minute intervals or greater. Because both earthen ponds are not in production, they are essentially an extension of the receiving water and effluent compliance samples could be collected anywhere downstream of the concrete raceways. Mr. Standal is currently electing to collect effluent samples at the discharge point of the FFSB associated with earth pond #5, which is a representative location according to current facility operations. If production were to resume on the second earthen pond (#6), Mr. Standal would need to adjust effluent sampling accordingly, which would ensure that effluent samples were continuing to be collected just prior to being discharged into the receiving water.

In the future, Mr. Standal mentioned that he may look into converting the earthen ponds (5 & 6) into concrete raceways with FFSBs.

The facility does not discharge from an off-line settling basin. Therefore, off-line settling basin and receiving water monitoring is not required under the permit.

The facility does not currently use copper products and is therefore not required to monitor for copper or hardness.

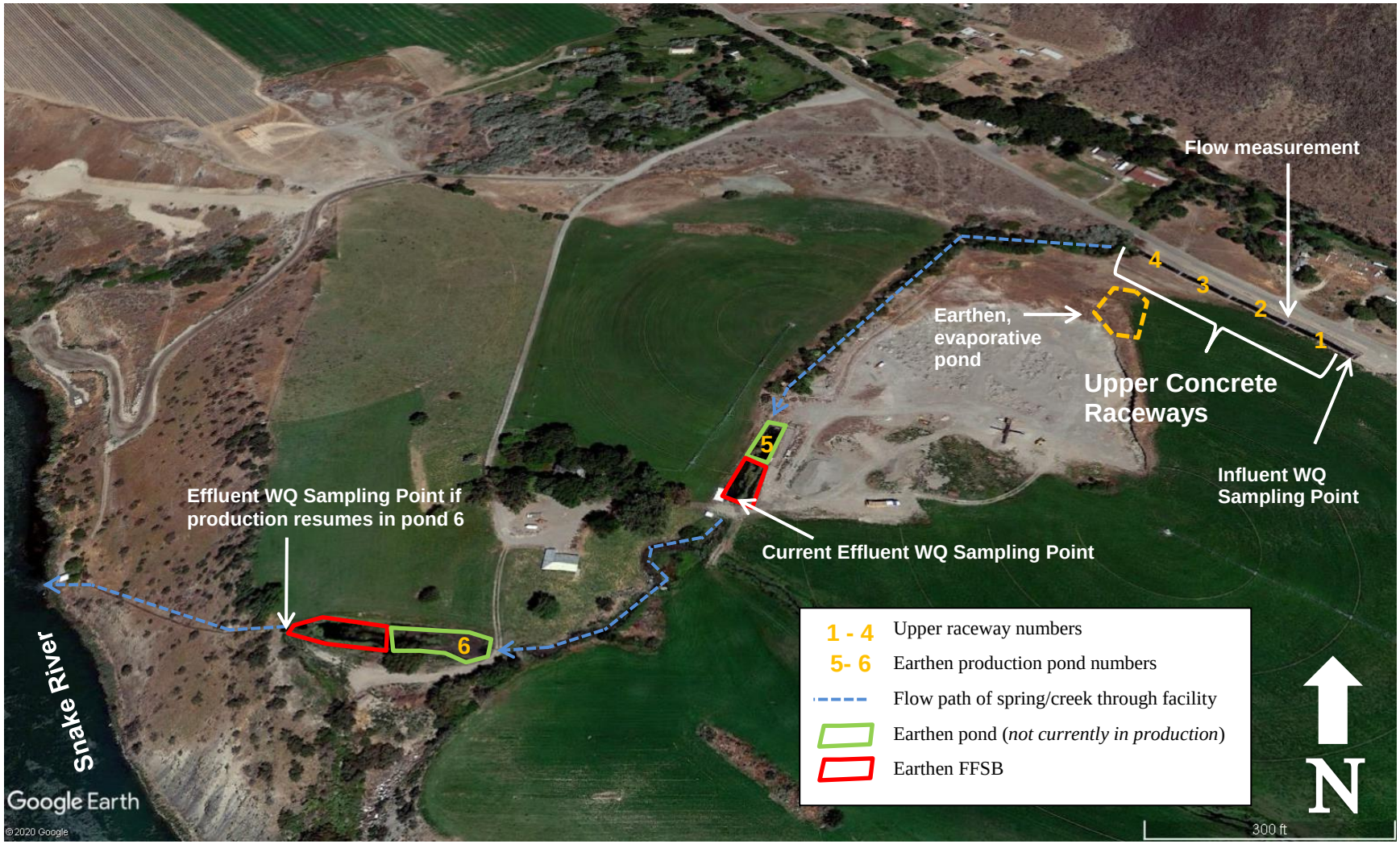


Figure 1. June 2016 Google Earth Imagery of Bedrock Ranch.

2 Inspection Chronology

2.1 Desk Review

Prior to the on-site inspection of Bedrock Ranch, an offsite document review was performed utilizing: the Department of Environmental Quality (DEQ) Content Manager, the Environmental Protection Agency (EPA) online NetDMR website, EPA Integrated Compliance Information System (ICIS), submittals received from Bedrock Ranch in accordance with the submission schedule contained in the Aquaculture General Permit IDG130000, and results from the last inspection conducted on September 22, 2014 by DEQ. The results of that review are discussed below.

2.1.1 Discharge Monitoring Reports

Mr. Standal has signatory authorization within NetDMR and signs all discharge monitoring reports (DMRs) for the facility.

Based on a NetDMR and ICIS review going back to the last inspection conducted in 2014, DMRs are generally being submitted on time and a spot-check of DMRs indicate that net loadings are being calculated correctly for this facility. April 2018, August 2018, and July 2019 DMRs were submitted late (**Table 1**).This would be an area of concern, however these late DMR submittals have all been administratively resolved in ICIS and are not being called out at this time.

Table 1. Late DMR submissions

Monitoring Month	DMR Due Date	Submittal Date
April 2018	May 20, 2018	July 13, 2018
August 2018	September 20, 2018	October 26, 2018
July 2019	August 20, 2018	September 29, 2019

Bedrock Ranch is required to monitor on a quarterly basis. As such, there are eight months per year in which monitoring is not required. Reviewing DMRs for months when monitoring was not required, revealed that Mr. Standal has inadvertently been using “0” to indicate that no sample was taken instead of the correct No Data Indicator (NODI) code “9.” These zeros are not being flagged in ICIS because the system interprets the zeros as data points. NODI code “9” should have been used, which is an area of concern.

Subsequent to the inspection, Mr. Standal submitted a DMR amendment request on March 2, 2020 authorizing DEQ to amend DMRs for instances where NODI code “9” should have been used to indicate conditional monitoring not required instead of the inadvertently used “0.” DEQ has since updated the DMRs from December of 2016 through February of 2020 in ICIS to reflect NODI code 9. As such, this area of concern has been adequately addressed and is not being called out at this time.

2.1.2 Receiving Water Monitoring

This facility does not have an off-line settling basin that discharges and is, therefore, not required to conduct surface water monitoring according to Part II.E.1 of the permit.

2.1.3 Previous Inspection Report

During the previous NPDES inspection at Bedrock Ranch, DEQ listed the following areas of concern:

- Quality assurance plan (QAP) was not in EPA/QA/R-5 and EPA/QA/G-5 format.
- The QAP contained only general statements on flow measuring devices and general descriptions for sampling and shipping methods.

2.1.4 Report Reviews

Annual reports were reviewed for 2014 - 2019 and appeared to be complete.

2.1.5 Formal Enforcement Issued by EPA

Bedrock Ranch currently has no outstanding enforcement actions with EPA.

2.2 Arrival Information

Date/Time:	February 12, 2020 / 12:30 PM
Inspector(s):	Nicholas Waters, IPDES Compliance Officer, DEQ TFRO (Lead Inspector) Tobby Kennedy, IPDES Compliance Officer, DEQ TFRO
Facility Representatives:	Stanley (Stan) and Loretta Standal
Weather:	Sunny, ~ 55 °F
Purpose:	To determine compliance with the facility's NPDES Permit IDG130119 in accordance with provisions of the Clean Water Act.

2.3 Opening Conference

This was an announced inspection. I, Nicholas Waters, initiated phone communication with Mr. Standal on January 13, 2020 and left a voicemail message. Mr. Standal returned my call on January 17, 2020 and we scheduled inspections for February 12, 2020 at two of the facilities that Mr. Standal operates: Bedrock Ranch and White Water Ranch and (IDG130026).

On February 12, 2020, Mr. Kennedy and I met Mr. and Mrs. Standal on-site at the White Water Ranch facility at 12:30 PM. Mr. Kennedy and I presented our EPA CWA NPDES inspector credentials and explained that we were there to conduct inspections on behalf of EPA Region 10 for the White Water Ranch and Bedrock Ranch facilities, in accordance with the Clean Water Act to determine compliance with the facilities' NPDES permits. After the White Water Ranch

site inspection Mr. Kennedy and I performed a site inspection of the Bedrock Ranch facility. We then conducted a document review for both facilities at Mr. and Mrs. Standal's home office. During the inspections, Mr. Kennedy and I were not denied access to any records or areas of the facilities.

2.4 Onsite Document Review

After the site inspection (**Section 2.5**), I proceeded to address the questions associated with DEQ's Aquaculture Facility Inspection Survey in detail, which included a review of on-site paperwork. Records are being maintained for at least five years and, upon request, facility representatives provided copies of the following documents and/or records associated with their permit:

- NPDES Permit Number IDG130026
- Notice of Intent (NOI)
- Quality Assurance Plan (QAP)
- Best Management Practices (BMP)
- Chains of Custody
- Lab Reports and DMRs

In accordance with Part VII.B of the permit (Duty to Reapply), the facility's NOI submission was complete and submitted to DEQ by White Water Fisheries, Inc. on May 31, 2012.

Mr. Standal has developed a QAP for the facility and submitted a QAP certification on January 24, 2008. Upon review of the QAP, it was found to be mostly complete and designed to assist in planning for the collection, preservation, transportation, and analysis of influent and effluent water samples in support of Part II.F of the Permit. The QAP did not list the specific flow measurement device for the facility and did not list the specific 40 CFR Part 136 test procedure method numbers for the required analyses. This is an area of concern.

Subsequent to the inspection, Mr. Standal updated the facility's QAP with the following information to satisfy this area of concern:

1. Specified the specific flow measurement method used at the Bedrock Ranch facility (**Appendix A**) and;

2. Included specific 40 CFR Part 136 test procedure method numbers (**Appendix B**).

Mr. Standal has developed a BMP for the facility and submitted BMP certification on January 15, 2012. The BMP appeared complete and is reviewed annually in accordance with annual reporting requirements (Part III.D of the Permit).

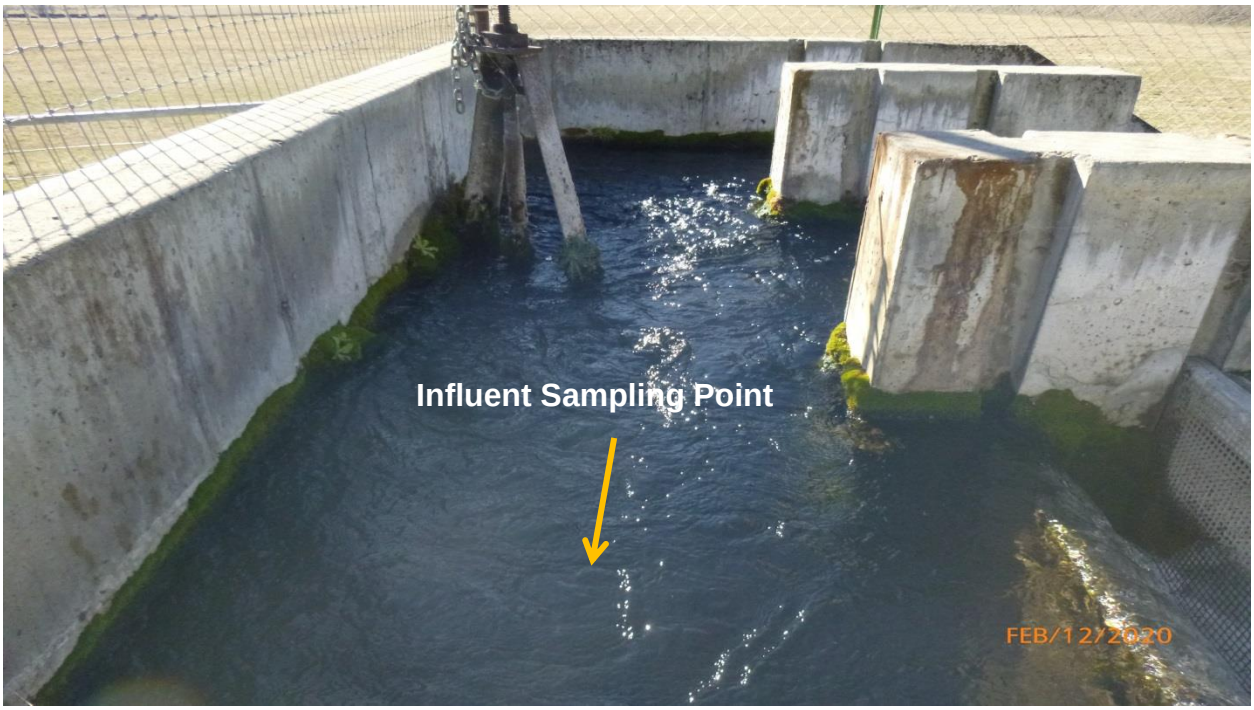
Lab reports and chains-of-custody in support of submitted DMRs appeared to be accurate and consistent with reported results. Chains of custody for January 2020 and October 2019 samples appeared to be complete and did not indicate sample receipt temperature exceedances.

2.5 Site Inspection

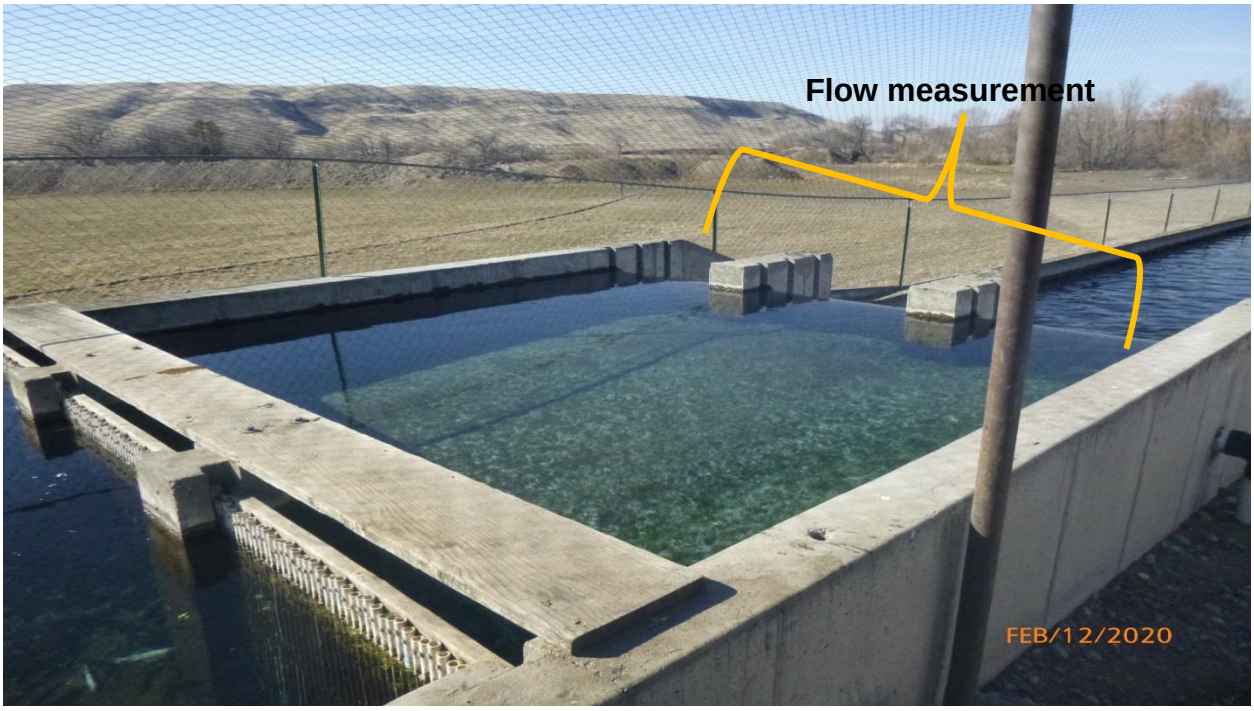
Mr. Kennedy and I inspected the following areas:

- Upper raceways (#1-4)
    - head ditch and influent sampling point
    - flow measurement: upper raceways
- Earthen production pond (#5) (not in production)
    - FFSB
    - Effluent sampling point
- Earthen production pond (#6) (not in production)
    - FFSB

2.5.1 Site Inspection Photographs



Photograph 1. Upper raceway head ditch - influent sampling point, facing west.



Photograph 2. Upper raceway flow measurement location, facing northwest.

Photograph 3. Earthen pond #5 and FFSB, facing north.

Photograph 4. Current effluent sampling point, facing northwest.

Photograph 5. Earthen pond #6 and FFSB, facing northwest.

2.5.2 Lab Inspection and Sampling Processes

Bedrock Ranch is considered a minor concentrated aquatic animal production facility. The facility produces between 100,000 and 500,000 pounds of fish per year and is, therefore, required to sample raceway influent and effluent constituents listed in Table 12 of the Permit on a quarterly basis and to monitor flow on a monthly basis. Both influent and effluent samples are composite samples that consist of a minimum of four aliquots taken at 30 minute intervals or greater.

WQ parameters are analyzed by Analytical Labs in Boise, Idaho. All sample collection and analysis is conducted in accordance with the facility's QAP.

2.5.3 Solids Disposal

Mr. Standal stated that the quiescent zone slurry from the upper, concrete raceways is sent to an earthen, evaporative pond west of the raceways. Solids are cleaned-out from the pond as necessary and can be land-applied on 50 acres of adjacent agricultural land.

Fish mortalities are composted on site.

2.6 Inspection Sampling

Samples were not collected by DEQ during this inspection (February 12, 2020).

3 Closing Conference

I discussed my inspection observations and potential areas of concern. I informed Mr. and Mrs. Standal that my findings would be outlined in an inspection report and that a copy would be provided to them. I thanked the Standals for their time and cooperation. The inspection concluded at 4:00 PM.

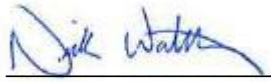
3.1 Compliance Assistance

- I informed Mr. Standal that when submitting DMRs for months when sampling is not required he should no longer populate these DMRs with zeros, but should instead use NODI code "9."
    - I informed Mr. Standal that he could submit a letter to DEQ requesting and authorizing the agency to amend DMRs to NODI code "9" for instances when a "0" was inadvertently used to indicate a monitoring event that was not required.
- I reviewed the minimum requirements of the QAP (Part II.F.3 of the permit) with Mr. Standal and had him amend the QAP to include 40 CFR Part 136 test procedure method numbers and a description of the facility's flow measurement procedure.

4 Areas of Concern

During the course of the inspection no areas of concern were identified.

Prepared By:



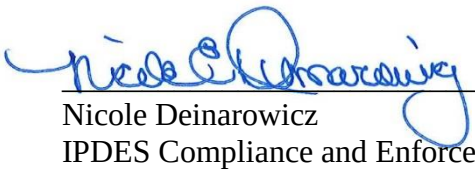
Date: March 20, 2020

Nicholas Waters
IPDES Compliance Officer
Department of Environmental Quality

Reviewed By:

Date: March 10, 2020

Tobby Kennedy
IPDES Compliance Officer
Department of Environmental Quality



Date: March 18, 2020

Nicole Deinarowicz
IPDES Compliance and Enforcement Officer
Department of Environmental Quality

Appendix A. QAP Amendment: Flow Measurement Procedure

Water Flow Measuring Procedures for Bedrock Ranch

Water flow measurements will be taken the same day as water samples are taken. On the upper raceways #1-4, water is measured over the 3 dam boards at the outflow of the first raceway. Each dam board is "stuck" with a ruler to read the weir heads. Using the weir tables in "Water Measurement," Bulletin No. 552, University of Idaho, a flow amount in CFS, is determined for each dam board section. The total of the 3 flow amounts is the raceway 1-4 water flow.

Appendix B. QAP Amendment: Inclusion of 40 CFR Part 136 Test Procedure Numbers

Parameter	Standard Methods	Sample Location	Sample Type	Sample Frequency	Number of Samples
TSS	USGS1-3765	In/Out	Composite	1/quarter	2
Total Phosphorus	EPA 365.1	In/Out	Composite	1/quarter	2
Total recoverable Copper		Out	Composite	1/quarter only when using copper	1
Hardness		Out	Composite	1/quarter only when using copper	1
Flow		In/Out	Flow Meter	1/month	2